

April 10, 2015

Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

MUR # 6934OFFICE
2015 APR 17 10:00:00

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Re: Complaint against Annette Taddeo and Annette Taddeo for Congress

To Whom It May Concern:

Pursuant to 2 USC § 437g(a)(1) and 11 CFR § 111.4, please accept this Letter of Complaint against Annette Taddeo ("Taddeo") and Annette Taddeo for Congress ("the Committee") for violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission ("FEC" or "Commission") regulations. Specifically, certain public communications violated the prohibition on the receipt of in-kind contributions from non-federal sources not subject to the limitations, prohibitions, and reporting requirements of the Act. 11 CFR § 300.61. Such communications made on behalf of Taddeo and the Committee also failed to include the proper disclaimers required by 2 U.S.C. § 441d.

I. Facts

Annette Taddeo is a candidate for the U.S. House of Representatives in the 2016 election cycle, running to represent Florida's Twenty-Sixth Congressional District. Annette Taddeo for Congress is the authorized principal campaign committee for Taddeo. Taddeo and the Committee have yet to register with the Commission. The Committee's website is located at <http://www.annettetaddeo.com/>. On April 6, 2015, an email communication was disseminated in which Taddeo publically declared her intention to run for Florida's Twenty-Sixth Congressional District's seat in the 2016 election cycle. This email was sent from an account (info@charliecris.com) owned and operated by Charlie Crist, Democrat, for Governor, the official campaign for Charlie Crist's gubernatorial candidacy in the State of Florida in 2014 ("Crist Campaign"). The only logical conclusion is that the recipients of this email were the compiled email contacts from candidate Charlie Crist's campaign list. The bottom of the email included a box stating, "PAID FOR AND APPROVED BY CHARLIE CRIST."

II. Relevant Law

The Act defines a contribution as a gift, subscription, loan, advance, or deposit of money or *anything of value* made by any person for the purpose of influencing any election for Federal office. 11 CFR 100.52(a). The term *anything of value* includes all in-kind contributions, defined as the provision of any goods or services without charge or at a charge that is less than the usual and normal charge for such goods or services. Examples of such goods or services include, but are not limited to: securities, facilities, equipment, supplies, personnel, advertising services, membership lists, and mailing lists. 11 CFR 100.52(d).

The Act also restricts the ability of federal candidates and officeholders to raise and spend nonfederal funds. Specifically, federal candidates may not solicit, receive, direct, transfer, spend or disburse funds in connection with a federal election, including funds for federal election activity, unless the funds are within the Act's limits, prohibitions, and reporting requirements. 11 CFR 300.61.

Additionally, the Act requires that any public communication made by a political committee display a disclaimer. 11 CFR 110.11(a)(1). A public communication is defined, in part, as any electronic mail of more than 500 substantially similar communications when sent by a political committee. 11 CFR 110.11(a)(1).

If such a public communication is authorized by a candidate, an authorized committee of a candidate, or an agent of either, but is paid for by any other person, the disclaimer must clearly state that the communication is paid for by such other person and is authorized by such candidate, authorized committee, or agent. 11 CFR 110.11(b)(2). Or, if the communication, including any solicitation, is *not* authorized by a candidate, authorized committee of a candidate, or an agent of either, the disclaimer must clearly state the full name and permanent street address, telephone number, or web address of the person who paid for the communication, and that the communication is not authorized by any candidate or candidate's committee. 11 CFR 110.11(b)(3).

III. Legal Analysis

Taddeo and the Committee have willfully disregarded Federal law by receiving an impermissible in-kind contribution from a non-federal candidate. The Crist Campaign is a not a registered committee subject to the Act's contribution limits, source prohibitions, and reporting requirements. Accordingly, the Crist Campaign may raise and spend nonfederal funds, which are used, in part, to develop and maintain that committee's web and email infrastructure, as well as its mailing lists. Therefore, the use of an email account, email list, and resources owned and

operated by the Crist Campaign in connection with Taddeo's federal candidacy constitutes the receipt of an impermissible in-kind contribution by Taddeo and the Committee, and is a violation of 11 CFR § 300.61. Moreover, Taddeo and the Committee have yet to disclose any of these uncompensated benefits as in-kind contributions to her federal campaign.

Furthermore, the email disseminated in support of and on behalf of Taddeo and the Committee failed to include a proper disclaimer as required by 11 CFR 110.11(a)(1). Federal law requires that such electronic mail include proper disclaimers. If the communication was authorized by Taddeo or the Committee, but was paid for by the Crist Campaign, the disclaimer must clearly state that the communication is paid for the Crist Campaign *and* is authorized by Taddeo or the Committee. Or, if the communication was not authorized by Taddeo or the Committee, the disclaimer must clearly state the full name and permanent street address, telephone number, or web address of the Crist Campaign, *and* that the communication is not authorized by Taddeo or the Committee. The disclaimer in the email failed to state whether or not Taddeo or the Committee authorized the public communication, thereby violating the disclaimer requirements of 2 U.S.C. § 441d and 11 C.F.R. § 110.11.

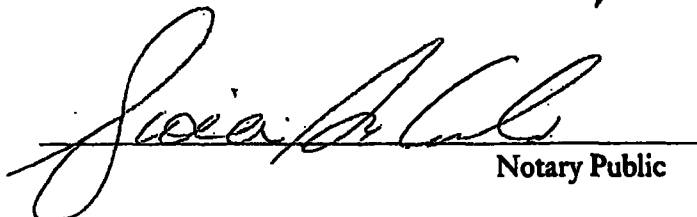
IV. Conclusion

Upon information and belief, and based upon the facts relayed herein, Taddeo and the Committee have violated the Federal Election Campaign Act of 1971, as amended, and Federal Election Commission Regulations as described herein. Accordingly, we respectfully request that the Commission conduct an immediate investigation into the violations outlined above and impose the maximum penalty under law.

The foregoing is correct and accurate to the best of my knowledge, information, and belief.

Respectfully submitted,

Sworn to and subscribed before me this 10th day of April, 2015.


Notary Public



GIOIA DECARLO
MY COMMISSION # FF 149648
EXPIRES: December 8, 2018
Bonded Thru Budget Notary Services

My Commission Expires:

Annette Taddeo's first fundraising email (Monday)

Last year I was honored to run alongside Charlie Crist for Lieutenant Governor. It was one of the greatest joys of my life to travel the state and hear from so many Floridians about their hopes and dreams for a better future.

I'm not finished fighting for Florida families — and I want you to be the first to know:

I am running for Congress in Florida's 26th district!

This is not a decision I take lightly, and I've thought long and hard about it.

But at the end of the day, I am running for the hardworking people of South Florida. The people who get up every day to go to work, raise their kids, and care for their families — and who deserve leaders who will work just as hard to represent them in Congress.

Click here to show your support for our campaign.

I'm a small business owner and a working mom. I've held minimum wage jobs and fought against tough odds to build a business from the ground up.

My story is like so many of your stories.

You can bet I'll use that determination to stand up for all of us in Congress.

Click here to stand with me.

Thanks for your support!

Annette

PAID FOR AND APPROVED BY CHARLIE CRIST.

We believe that emails are a vital way to stay in direct contact with supporters. You can also like Charlie on [Facebook](#) or following him on [Twitter](#).
Click [here](#) if you'd like to unsubscribe from these messages.

Charlie Crist, P.O. Box 1067, St. Petersburg, Florida 33731

Tuesday Annette Taddeo Fundraising Email

Back in 2014, one of the hardest choices I had to make was who to pick as my running mate — until I met Annette.

When I heard Annette's story, I knew she was the real deal. She is a working mom, a successful small business owner, an immigrant with an amazing story that will make you believe in the American Dream again. Most of all, Annette is smart, hard-working, and has an amazing heart.

That is why today I couldn't be prouder to offer my enthusiastic endorsement of Annette Taddeo for Congress.

Add your name to stand with Annette

>> <http://action.annettetaddeo.com/announcement>

She is exactly the kind of leader we need in Congress: hardworking, open-hearted, someone who understands the everyday struggles facing Floridians.

I know she will use her voice to stand up for all of us.

Click here to show your support for Annette.

Thanks,

Charlie

P.S. -- Today also happens to be Annette's birthday! Make sure you wish her a happy birthday when you sign up to join her grassroots team.

PAID FOR AND APPROVED BY CHARLIE CRIST.

This email was sent to: kderby@sunshinestatenews.com.

We believe that emails are a vital way to stay in direct contact with supporters. You can also like Charlie on [Facebook](#) or following him on [Twitter](#). Click [here](#) if you'd like to unsubscribe from these messages.

Charlie Crist, P.O. Box 1067, St. Petersburg, Florida 33731

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